LEGAL & PRIVACY

# PRIVACY POLICY

**Saul Rudnick**
ABN 13 560 988 797 · Australian Credit Representative 544546
*Last updated: 4 September 2026*

**Saul Rudnick is a Credit Representative (544546) of LOANBASE PTY LTD Australian Credit Licence 508308.**

## 1. About this policy

This Privacy Policy explains how Saul Rudnick ("I", "me" or "my") collects, holds, uses and discloses personal information through this website, and the services, tools and content offered on it, including finance and mortgage broking information, the reverse mortgages book and related educational content, calculators, and any booking or enquiry tools made available from time to time. I am committed to handling personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). As a credit representative, I am required to comply with the Privacy Act regardless of my annual turnover, because entities involved in consumer credit fall outside the small business exemption that would otherwise apply.

## 2. What personal information I collect

The kinds of personal information I collect depend on how you interact with the website, and may include:

- Contact details, such as your name, email address, phone number and postal address
- Information you provide through enquiry forms, contact forms, calculators or tools on the site
- Information you provide when signing up to a newsletter or blog updates
- Information you provide when booking an appointment or call through an online booking calendar
- Messages, questions or documents you provide through an online chat tool or chatbot
- Financial and credit-related information you choose to provide in connection with a loan or finance enquiry, such as income, assets, liabilities and existing loan details
- Technical information collected automatically when you browse the site, such as your IP address, browser type, device and location information, whether you have accessed third-party sites, and the pages you view

This does not include sensitive information, which is addressed separately in section 3 (Sensitive information) below.

## 3. Sensitive information

Sensitive information is a special category of personal information under the Privacy Act. It includes information about your racial or ethnic origin, political opinions, religious or philosophical beliefs, membership of a professional or trade association or trade union, sexual orientation, criminal record, and health information, as well as any information you tell me about a vulnerability you may have. I will only collect sensitive information about you with your consent, and only where it is relevant to assisting you — for example, health information you choose to share in connection with a

reverse mortgage or equity release enquiry, or information about a vulnerability that affects how I should communicate with you.

## 4. How I collect personal information

Wherever practicable, I collect personal information directly from you — for example, when you complete a form, use a calculator, subscribe to updates, book a time in my calendar, or send me a message through the site or a chatbot. I may also collect personal information from third parties where you have authorised this, such as a mortgage aggregator, referral partner, lender, or accountant or financial adviser you have asked to liaise with me on your behalf.

I may also collect information about you that is publicly available, for example from public registers or social media, or made available to me by third parties such as your accountant or lawyer. The website may also use cookies and similar tracking technologies to understand how the site is used. See section 8 (Cookies and analytics) below.

## 5. Why I collect, hold, use and disclose personal information

I collect and use personal information for purposes including:

- Responding to your enquiries and providing information about mortgage, finance and reverse mortgage products and services
- Assessing and progressing a loan or finance application, and liaising with lenders, aggregators and other relevant third parties on your behalf
- Providing educational content, including content connected to the reverse mortgages book
- Sending newsletters, blog updates or marketing communications, where you have subscribed or otherwise consented, and in line with the Spam Act 2003 (Cth)
- Operating and improving the website, including through analytics
- Complying with legal and regulatory obligations, including those under the National Consumer Credit Protection Act 2009 (Cth) and responsible lending obligations

I will not use or disclose personal information for a purpose other than the purpose for which it was collected, unless you would reasonably expect that use or disclosure, you have consented, or the use or disclosure is otherwise permitted or required by law.

## 6. Who I may disclose personal information to

Depending on the nature of your enquiry, I may disclose personal information to:

- Banks, non-bank lenders and other credit providers, for the purpose of assessing and progressing a loan or finance application
- My aggregator and any mortgage or finance industry bodies I am required to report to
- Service providers who help operate this website and my business, such as customer relationship management (CRM) and email platforms, appointment scheduling tools, and website hosting providers
- Analytics and advertising platform providers, as described in section 8
- Anybody who represents you, such as a lawyer, guarantor, guardian, or person holding power of attorney
- Identity verification service providers
- Professional advisers, such as my accountant or lawyer, where necessary

- Government and law enforcement agencies or regulators, including where required under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)
- Regulators or other parties, where required or authorised by law

I do not sell personal information to third parties.

## 7. Credit-related information and credit reporting bodies

As a credit representative, I collect and exchange credit-related information for the purpose of assessing your application for finance and managing that finance. “Credit-related information” includes credit information (such as the type and amount of credit provided to you, repayment history, financial hardship information, default information, and any serious credit infringements) and credit eligibility information (information a credit reporting body gives me, and anything I derive from it). I exchange credit-related information with credit reporting bodies to confirm your identity, assess your creditworthiness, assess your application for finance or your capacity to act as a guarantor, and manage your finance. This may include your identification details, the type and amount of credit you hold, whether you have met your repayment obligations, and whether you have committed a serious credit infringement. If you fail to meet your payment obligations on finance I have arranged, or you commit a serious credit infringement, I may disclose this to a credit reporting body.

You can ask a credit reporting body not to use your credit information for the purpose of ‘pre-screening’ credit offers on behalf of other credit providers. If you believe you have been the victim of fraud, you can notify a credit reporting body directly — once notified, it must not use or disclose your credit information for a period of 21 days. You have the right to request access to, and correction of, the credit-related information I hold about you — see section 15 (Access and correction). You can contact the following credit reporting bodies for more information:

- Equifax Pty Ltd – www.equifax.com.au
- illion Australia Pty Ltd – www.illion.com.au
- Experian Australia Credit Services Pty Ltd – www.experian.com.au

## 8. Cookies and analytics

This website uses Google Analytics to help me understand how visitors use the site, and may use advertising tools such as Google Ads and the Meta (Facebook/Instagram) pixel to measure the performance of advertising campaigns and show relevant advertising. These tools may place cookies on your device and collect information about your browsing activity on this and other websites. You can control or disable cookies through your browser settings. Doing so may affect how some parts of the website function. You can also review Google’s and Meta’s own privacy and advertising policies for information about how they handle data collected through these tools.

## 9. Overseas disclosure

Some service providers I use, including website hosting, my customer relationship management (CRM) platform, analytics, email and advertising platforms, may store or process personal information outside Australia. Where this occurs, I take reasonable steps to ensure that personal information is handled appropriately and in accordance with the privacy obligations that apply to my activities in Australia.

## 10. Government related identifiers

If I collect a government-related identifier about you, such as a Tax File Number, Medicare number or Centrelink reference number, I will not use or disclose that identifier except as required or authorised by law, and I will never use a government-related identifier to identify you.

## 11. Anonymity and pseudonymity

Where it is lawful and practicable, you may deal with me without identifying yourself, or by using a pseudonym — for example, if you are making a general enquiry about reverse mortgages, interest rates, or how a product works. In most cases, however, I will need to identify you in order to progress a loan or finance enquiry on your behalf.

## 12. Data quality and security

I take reasonable steps to ensure the personal information I hold is accurate, complete and up to date, and to protect it from misuse, interference, loss, and unauthorised access, modification or disclosure. This includes:

- Using password-protected systems and secure logins for all platforms that store personal information
- Using reputable, access-controlled cloud storage for enquiry and client information
- Limiting access to personal information to what is necessary to provide my services
- Securely destroying or de-identifying personal information once it is no longer required for the purposes described in this policy

No method of electronic storage or transmission is completely secure, and I cannot guarantee absolute security of information sent to me over the internet.

## 13. Direct marketing

From time to time, I may use your personal information to send you information about mortgage and finance products, reverse mortgage and equity release updates, book-related content, or other services I think may interest you, where you have subscribed or otherwise consented. You can opt out of receiving marketing communications at any time by contacting me using the details in section 19 (Contact me), or by using the unsubscribe link included in any marketing email. I will not charge you for actioning this request and will do so as soon as reasonably possible. I do not sell your personal information to third parties for direct marketing purposes.

## 14. Updating your personal information

It is important to me that the personal information I hold about you is accurate and up to date. If any of your personal information changes, please let me know so I can update my records. If you have a written agreement with me, you must also notify me of any changes required under that agreement.

## 15. Access and correction

You may request access to the personal information I hold about you, and ask me to correct it if it is inaccurate, out of date, incomplete, irrelevant or misleading. I will acknowledge your request within 7 days and aim to provide access, a correction, or an outcome of my investigation within 30 days. In some circumstances I may need to verify your identity before providing access, and there may be limited circumstances in which I am not required to provide access, such as where this would be unlawful or would unreasonably impact the privacy of others. If I decline a request for access or correction, I will explain why.

## 16. Complaints

If you are dissatisfied with how I have handled your personal information, or have any other complaint about my conduct as a credit representative, please contact me using the details in section 19 (Contact me) so I can investigate and respond. I will acknowledge your complaint within 7 days and aim to provide you with a decision within 30 days. If you

are not satisfied with my response, you can lodge a complaint with the Australian Financial Complaints Authority (AFCA), the external dispute resolution scheme of which I am a member in my own right as a credit representative:

- My AFCA membership number: 95337
- Website: www.afca.org.au
- Phone: 1800 931 678 (free call)

For complaints specifically about how I have handled your personal information under the Privacy Act, you can also contact the Office of the Australian Information Commissioner (OAIC):

- Website: www.oaic.gov.au
- Phone: 1300 363 992

## 17. Other websites and third-party links

This website may contain links to third-party websites, such as Amazon or other retailers where the reverse mortgages book can be purchased, or to lender or aggregator platforms. I am not responsible for the privacy practices of those third-party sites, and I encourage you to review their privacy policies before providing any personal information to them.

## 18. Changes to this policy

I may update this Privacy Policy from time to time to reflect changes in my practices or legal obligations. The current version will always be available on this website, and the "Last updated" date at the top of this page will reflect the most recent version. If you would like this policy provided to you in an alternative form, please contact me using the details in section 19 (Contact me).

## 19. Contact me

If you have any questions about this Privacy Policy, or wish to access, correct or make a complaint about your personal information, you can contact me at:

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